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November 30, 2023

BY EMAIL & ECF

Chief Judge Laura Taylor Swain
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Aimee Harris; 22 Cr. 457 (LTS)

Dear Chief Judge Swain:

As the Court is aware, we represent Aimee Harris in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A.

Pursuant to the Court’s Order, dated November 21, 2023, we provided a copy of said Order the same day to Ms. Harris. Since then, we have made every effort to ascertain her availability up and until December 15, 2023. Today, we learned from Ms. Harris that she does not have any funds for travel, meals and lodging¹ and has other important personal obligations involving her family court case and the care of her father. As such, she cannot appear in person.

Notwithstanding the Court’s clear decision to proceed with an in-person conference and a substitution of counsel proceeding on consecutive days, we write at the asking of Ms. Harris to respectfully request that the Court schedule an immediate virtual substitution of counsel proceeding. At that time, Ms. Harris’ issues related to our representation may be addressed by Your Honor followed by the scheduling of a firm sentencing date.

Thank you for your consideration.

¹ While she is grateful for the Court’s consideration of an application for funding for airfare and reimbursement of expenses under the Criminal Justice Act, she presently does not have the cash flow to pay out of pocket for travel expenses, which will include lodging, meals and transportation for two consecutive days.

Respectfully submitted,

/s/

Anthony Cecutti
Kestine Thiele